

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DELAWARE MARKETING PARTNERS,
LLC, a Delaware limited liability company,

Plaintiff

CA No.: 04-263

v.

JUDGE McLAUGHLIN AND
MAGISTRATE JUDGE
SUSAN PARADISE BAXTER

CREDITRON FINANCIAL SERVICES,
INC, a Pennsylvania corporation, and,
TELATRON MARKETING GROUP,
INC., a Pennsylvania corporation,

TRIAL BY JURY DEMANDED

Electronically Filed

Defendants

MOTION TO COMPEL DISCOVERY RESPONSES

AND NOW, comes the Plaintiff, by and through its attorneys, Dickie, McCamey & Chilcote, P.C., and files the following Motion to Compel Discovery Responses averring as follows:

1. Plaintiff filed this lawsuit which involves a contract dispute arising out of certain revenues associated with a student loan origination and marketing agreement entered into between the parties.

2. On September 14, 2005, Plaintiff served Interrogatories and Requests for Production of Documents upon Defendant. Attached hereto as Exhibit A is a copy of Plaintiff counsel's transmittal letter.

3. On October 25, 2005, counsel for Plaintiff made a good faith attempt to obtain the information requested and to resolve this matter by discussing and requesting this information

from counsel prior to filing this Motion to Compel. Attached hereto as Exhibit B is a copy of the letter evidencing the same.

4. To date, Plaintiff has not received responses to the discovery requests.

5. Without the requested information, Plaintiff will be seriously prejudiced in its ability to prepare this case for trial.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to enter an Order compelling Defendant to respond to said discovery within fifteen (15) days or suffer sanctions as this Court may deem appropriate.

Respectfully submitted,

DICKIE, McCAMEY & CHILCOTE, P.C.

By s/ *Brett W. Farrar*

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